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ATTORNEYS FOR DEBTOR SUPERIOR AIR PARTS, INC.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

\$ Case No. 08-36705

\$ SUPERIOR AIR PARTS, INC.,

\$ Chapter 11

\$ Debtor.

DEBTOR'S OBJECTION TO CLAIM NO. 67 FILED BY BROWARD COUNTY REVENUE COLLECTOR

TO: THE HONORABLE BARBARA J. HOUSER UNITED STATES BANKRUPTCY JUDGE:

A HEARING MAY NOT BE CONDUCTED HEREON UNLESS A RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL BUILDING, U.S. COURTHOUSE 1100 COMMERCE STREET - ROOM 1254 DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS ON SEPTEMBER 10, 2009, WHICH IS THIRTY (30) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A

HEARING WILL BE HELD WITH NOTICE TO ALL INTERESTED PARTIES.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

Superior Air Parts, Inc. ("<u>Superior</u>" or "<u>Debtor</u>"), as debtor and debtor-in-possession, files this objection to the proof of claim filed by Broward County Revenue Collector (Claim No. 67), and would show as follows:

- 1. On February 3, 2009, Broward County Revenue Collector filed proof of claim number 67 in the amount of \$12,707.69, as a secured claim for 2009 estimated personal property tax.
- 2. Superior objects to Claim No. 67 in its entirety because Superior has no personal property in the State of Florida. The attachments to Claim No. 67 reflect property owned and ad valorem taxes owed by others, not Superior.

WHEREFORE, the Debtor request that the Court grant this Objection and deny the Proof of Claim and for such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Stephen A. Roberts
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BANKRUPTCY ATTORNEYS FOR DEBTOR

SUPERIOR AIR PARTS, INC.

The undersigned certifies that true and correct copies of the foregoing pleading were forwarded to the parties listed below via first class U.S. Mail, postage prepaid, on the 11th day of August, 2009.

CERTIFICATE OF SERVICE

Claimant:

Broward County Revenue Collector Revenue Collection Division Government Center Annex Attn: Litigation Section 115 S. Andrews Avenue Ft. Lauderdale, FL 33301

Debtor:

Superior Air Parts, Inc. 621 S. Royal Lane, Suite 100 Coppell, TX 75019-3805

U.S. Trustee:

Mary Frances Durham
Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242

<u>Counsel for the Committee</u>: David W. Parham, Elliot Schuler & A. Swick Baker & McKenzie LLP 2001 Ross Ave., Suite 2300 Dallas, TX 75201

> /s/ Stephen A. Roberts Stephen A. Roberts